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US EPA RECORDS CENTER REGION 5



503906

September 11, 1998

Mr. Ralph Dollhopf
On-Scene Coordinator
United States Environmental Protection Agency
Emergency Response Branch - Section 1
9311 Groh Road
Grosse Ile, Michigan 48138

Re: MichCon Station H
Detroit, Wayne County, Michigan
TDD S05-803-016
PAN 8M1601RAXX

Dear Mr. Dollhopf:

On July 15, 1998, the United States Environmental Protection Agency (U.S. EPA) On-Scene Coordinator (OSC) Ralph Dollhopf requested that the Ecology and Environment, Inc. (E & E), Superfund Technical Assessment and Response Team (START) prepare a letter to summarize actions completed to date at the MichCon Station H (MCH) site in Detroit, Wayne County, Michigan. The summary letter includes U.S. EPA removal activities and actions completed by the City of Detroit. The letter also summarizes the removal of nonhazardous debris, asbestos abatement, and demolition of three buildings on the subject property.

The MCH site is located at 201 South Green Avenue, Detroit, Wayne County, Michigan (latitude 42°18'10"N and longitude 83°6'19"W). The site is bordered to the northwest by the Chesapeake and Ohio Railroad tracks, to the northeast by Post Street, to the southeast by a commercial business, and to the southwest by South Green Avenue and a commercial produce distributor. Approximately 16,500 people reside within a 1-mile radius of the site. Detroit Southwestern High School is located approximately 500 feet northeast of the site at the corner of Post Street and Fort Street.

The MCH site consists of three properties which are located in an urban/industrial area of Detroit. The site was owned and operated by the Detroit City Gas Company (DCGC) between 1913 and 1945, and served as a carburetted water gasification plant. DCGC is currently known as the Michigan Consolidated Gas Company (MichCon). Operations at the site ceased in 1945. The largest property was sold to the American Charcoal Company (ACC), while MichCon retained a small property situated along the northwestern portion of the site. ACC operated the property between 1946 and 1976. In 1976, the ACC property was sold to the A & A Scrap Iron Metal Company (A & A). A & A utilized the property as a scrap metal storage and processing facility until 1995, when the property reverted to the State of Michigan due to nonpayment of property taxes. In November 1997, the City of Detroit obtained the property from the State of Michigan for Brownfields redevelopment. The adjacent property, currently owned by MichCon, was retained to maintain an underlying natural gas line and was the former location of a natural gas regulator station along the railroad tracks. The current owner of the property located on the southeastern portion of the site, is presently unknown.

In February 1998, the U.S. EPA OSC and START conducted a site reconnaissance which revealed the presence of two polychlorinated biphenyl (PCB)-contaminated electrical capacitors, PCB-contaminated soil and debris, abandoned drums, and various types of nonhazardous debris scattered throughout the site. On March 30 and 31, 1998, the City of Detroit Department of Public Works (DPW) mobilized to site and removed the majority of the nonhazardous debris. On May 28, 1998, Industrial Waste Cleanup, Inc. (IWC), the City of Detroit's asbestos abatement contractor, mobilized to the site and removed approximately 540 linear feet of asbestos-containing material (ACM).

On June 8, 1998, the Emergency Response Cleanup Services (ERCS) contractor, Environmental Quality Management (EQM); and its subcontractors, Clay Morrison Corman (CMC) and Inland Waters Corporation, mobilized to site to begin the U.S. EPA removal action. Prior to removal activities, a command post, consisting of an office and decontamination trailer, was established on the southern end of the site. ERCS began consolidating tires, removing nonhazardous debris, and clearing site vegetation.

On June 9, 1998, two PCB-contaminated electrical capacitors, along with PCB-contaminated soil and debris surrounding the capacitors, were placed into drums for transportation and disposal at an off-site facility. Three tanks, containing a total of approximately 200 gallons of liquid; fourteen 30-gallon drums of a grease-like material; 17 compressed gas cylinders; an additional electrical capacitor, suspected to contain PCB-contaminated oil; and suspected ACM were discovered on site. All containers and materials were separated and staged for disposal by ERCS.

On June 10, 1998, IWC removed the ACM discovered at the site. One 30-cubic-yard rolloff box of metal debris was transported off site by R & F Metals Company, Inc. (R & F), Detroit, Michigan, to its facility for recycling.

On June 11, 1998, two additional 30-cubic-yard rolloff boxes of metal debris were transported from site by R & F for recycling. The 17 high-pressure gas cylinders were transported by Michigan Air Gas to its facility for reclamation. A total of 40 drums were discovered on site and staged. Composite samples were collected based on the consistency and color of the material in each container. Material in the drums were separated into five wastestreams, as follows: MCHBG1, a brown grease-like substance; MCHWG1, a white grease-like substance; MCHP1, solid polymer substances; MCHS1, dark-colored solids with a soil consistency; and MCHWS1, white-colored solids similar to dried grease. Samples were sent to Shrader Analytical and Consulting Laboratory (Shrader), located in Detroit, Michigan, for laboratory analyses, including: PCBs, total Resource Conservation and Recovery Act (RCRA) metals, and flash point. Analytical results from these samples indicated that drum contents were nonhazardous (Attachment A, Table 1). Two additional electrical capacitors, suspected to contain PCB-contaminated oil, were discovered on June 11, 1998.

On June 12, 1998, START prepared an Extent-of-Contamination (EOC) Sampling Plan to determine the extent of PCB contamination in surface soil (Attachment B). On June 15, 1998, EOC sampling commenced to determine PCB contamination in surface soil on site. An action level of 25 ppm for PCB contamination in soil was utilized according to the Toxic Substances Control Act (TSCA) of 1987, Part 761, Subpart G. A 30-foot by 30-foot grid system was established over the subject property (Attachment C, Figure 1). Soil samples were collected from selected grid sections and sent to Shrader for PCB analyses. Analytical results indicated that soil from the areas north and east of on-site buildings were contaminated with PCBs in excess of the 25 ppm action level. Analytical results indicated that areas immediately east and southeast of the on-site buildings contained no PCB concentrations above the action level (Attachment A, Table 2). Soil from areas where PCB-contaminated electrical capacitors were present was excavated and stockpiled.

On June 16, 1998, soil confirmation sampling began in areas where soils had been removed due to the presence of PCB-contaminated electrical capacitors. Analytical results indicated elevated levels of PCB-contaminated soil above the action level (Attachment A, Table 3). The City of Detroit DPW transported five 36-cubic-yard loads of stockpiled tires from the site to the Detroit Recycling Center for recycling.

On June 17, 1998, four drums suspected to contain #2 fuel oil were transported to Michigan Recovery Services, Inc., located in Romulus, Michigan. In addition, one drum, containing five PCB-contaminated electrical capacitors, was transported to a USPCI facility in Twinsburg, Ohio, for disposal. An ERCS subcontractor, Berner Trucking, transported 830 tons of PCB-contaminated soil to Wayne Disposal, Inc. (WDI), Belleville, Michigan. EOC soil sampling was completed in the northeastern portion of the subject property, and confirmation sampling began in areas that known PCB-contaminated soil had already been removed (Attachment A, Table 4). The remaining EOC analytical results confirmed the presence of PCBs in excess of 25 ppm throughout the northeastern portion of the site. Forty nonhazardous drums and their contents were crushed and mixed with PCB-contaminated soil and debris for disposal.

On June 18, 1998, 887 tons of PCB-contaminated soil were transported to WDI. Following soil removal activities, confirmation soil samples were collected from selected areas of the soil removal. Analytical results indicated that PCB-contaminated soil above the action level was still present (Attachment A, Table 5).

On June 19, 1998, 542 additional tons of PCB-contaminated soil were transported to WDI. Confirmation sampling of the stockpiled soil continued to assess PCB contamination. Analytical results indicated that PCB-contaminated soil was present above the action level criteria (Attachment A, Table 6). All office trailers, equipment, and personnel were demobilized from site, excluding START personnel, the EQM response manager, a CMC operator and one trackhoe.

On June 22, 1998, Owens Fencing, a local subcontractor, mobilized to site and installed a perimeter fence. The fence was erected along the site perimeter, excluding the building's foundation at the corner of South Green Avenue and the railroad property. U.S. EPA determined that after the building was demolished the fence around the site would be completed. Soil excavation in areas where analytical results did not meet the cleanup criteria continued. An additional round of confirmation soil sampling was completed in these areas. Analytical results indicated that PCB-contaminated soil above the action level was present on site (Attachment A, Table 7).

On June 23, 1998, additional soil was excavated and stockpiled on site. Additional confirmation sampling was conducted in the area of soil removal. Analytical results indicated that PCB-contaminated soil above the action level was still present on site (Attachment A, Table 8).

On June 24, 1998, 42 tons of PCB-contaminated soil were transported from the site to WDI. Confirmation soil sampling was conducted in areas where soil had been removed. Analytical results indicated all PCB-contaminated soil was less than the 25 ppm action level (Attachment A, Table 9). The first phase of the perimeter fence was completed by Owens Fencing. The trackhoe was decontaminated using a dry decontamination method, and the trackhoe, CMC operator, and response manager demobilized from site.

On July 1, 1998, Adamo Demolition Company, the City of Detroit's building demolition contractor, mobilized to site and completed the demolition of site buildings by July 9, 1998. The final loads of building debris were removed from site on July 9, 1998, and Owens Fencing returned to site and completed the construction of the perimeter fence. Samples of suspected manufactured gas plant (MGP) waste, found in the northern and central portions of the site during various phases of the PCB soil excavation, were collected by START and sent to Laidlaw Environmental, Inc./Encotec and Texas Oiltech Laboratories, Inc., for analyses. Analytical results indicated that the material contained elevated concentrations of iron and cyanide, which is indicative of MGP waste (Attachment A, Tables 10 and 11). On July 13, 1998, START returned to site and placed 12 signs on the perimeter fence that read, "Dangerous - Hazardous Substances Present- Keep Out," at approximately 100-foot intervals. START locked the gate located on South Green Avenue with a chain and padlock. At the request of U.S. EPA, keys to this lock were supplied to the City of Detroit DPW and the Detroit Fire Department.

On August 17, 1998, approximately 300 feet of the perimeter fence was removed from the fence posts by an unknown party. The incident was reported to the City of Detroit Police Department on August 18, 1998. The 300 feet of fence was recovered by the City of Detroit Police Department. Two men were charged and arrested on site with the fence in their vehicle. U.S. EPA contacted the fence contractor to re-install the fence section. The fence contractor, Owens Fencing, was not available until August 19, 1998.

On August 19, 1998, Owens Fencing arrived at the site and re-installed the 300 feet of fence. The contractor also tack welded the fence to each fence post and painted a yellow strip across the center of the fence to act as a deterrent to future theft attempts. The fence section and additional tasks were completed on August 19, 1998.

The preparation of this letter completes the request for a summary report. If you have any questions or need additional information, please contact our office.

Sincerely,



Erin Busby
START Project Manager



Michael Dieckhaus
START Assistant Program Manager

Attachments: A - Tables
 B - Extent-of-Contamination Sampling Plan
 C - Site Illustration

cc: Site file

Attachment A

Tables

1

<p align="center">Table 1</p> <p align="center">Inorganic Analytical Results from Consolidated Drum Wastestreams</p> <p align="center">MichCon Station H</p> <p align="center">Detroit, Wayne County, Michigan</p> <p align="center">June 11, 1998</p> <p align="center">(units = mg/kg)</p>					
Parameter	Sample Designation				
	MCHBG1	MCHWG1	MCHP1	MCHS1	MCHWS1
Arsenic	8.1	2.5	ND	ND	ND
Barium	211	30.6	2.1	16.9	8.9
Cadmium	1.5	ND	ND	ND	ND
Chromium	32	3.6	ND	6.4	2.0
Copper	86.2	13.6	ND	9.4	4.0
Lead	16	31.8	ND	18.6	5.2
Mercury	ND	ND	ND	ND	ND
Selenium	ND	ND	ND	ND	ND
Silver	ND	ND	ND	ND	10.8
Zinc	313	40.1	ND	45.1	ND

Key: mg/kg = Milligrams per kilogram.
 ND = Not detected.

Source: Analytical services procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc

<p align="center">Table 2</p> <p align="center">PCB Soil Sampling Analytical Results</p> <p align="center">MichCon Station H</p> <p align="center">Detroit, Michigan</p> <p align="center">June 15, 1998</p> <p align="center">(units = ppm)</p>		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-A4	ND	11.8
MCHPCB-A9	ND	3.23
MCHPCB-B7	21.7	ND
MCHPCB-C1	ND	6.95
MCHPCB-C2	18.8	ND
MCHPCB-C3	17.4	ND
MCHPCB-C4	25.9	ND
MCHPCB-C9	17.4	ND
MCHPCB-D5	19.8	ND
MCHPCB-E6	6.8	ND
MCHPCB-E7	9.4	ND
MCHPCB-E9	ND	15.1
MCHPCB-F8	5.59	ND
MCHPCB-F14	ND	0.98
MCHPCB-G9	5.75	ND
MCHPCB-G10	ND	3.23
MCHPCB-G10D	7.63	ND
MCHPCB-H10	ND	6.9
MCHPCB-H13	5.79	ND
MCHPCB-I10	15.1	ND
MCHPCB-I13	ND	3.2
MCHPCB-I16	ND	1.11
MCHPCB-J15	ND	2.9

Key: ppm = Parts per million.
ND = Not detected.

Source: Analytical services procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc

<p align="center">Table 3</p> <p align="center">PCB Soil Sampling Analytical Results</p> <p align="center">MichCon Station H</p> <p align="center">Detroit, Michigan</p> <p align="center">June 16, 1998</p> <p align="center">(units = ppm)</p>		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-D3	34.7	ND
MCHPCB-D4	39.0	ND
MCHPCB-E3	ND	38.0
MCHPCB-E4	ND	43.7
MCHPCB-E5	ND	32.0
MCHPCB-F3	ND	66.0
MCHPCB-F4	ND	27.3
MCHPCB-F5	ND	43.0
MCHPCB-F6	ND	14.0
MCHPCB-F7	ND	12.7
MCHPCB-G3	ND	22.7
MCHPCB-G4	ND	24.0
MCHPCB-G5	ND	87.7
MCHPCB-G6	ND	14.7
MCHPCB-G7	ND	12.3
MCHPCB-G8	ND	13.3
MCHPCB-H3	ND	34.3
MCHPCB-H4	ND	95.3
MCHPCB-I3	ND	18.0

Key: ppm = Parts per million.
ND = Not detected.

Source: Analytical services procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc.

<p align="center">Table 4</p> <p align="center">PCB Soil Sampling Analytical Results</p> <p align="center">MichCom Station H</p> <p align="center">Detroit, Michigan</p> <p align="center">June 17, 1998</p> <p align="center">(units = ppm)</p>		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-A7	30.5	ND
MCHPCB-A8	4.22	ND
MCHPCB-B8	8.18	ND
MCHPCB-B9	8.46	ND
MCHPCB-B10	50.6	ND
MCHPCB-C7	15.3	ND
MCHPCB-C8	ND	26.1
MCHPCB-C10	19.5	ND
MCHPCB-D7	14.0	ND
MCHPCB-D8	10.7	ND
MCHPCB-D9	11.5	ND
MCHPCB-D10	14.8	ND
MCHPCB-E8	ND	14.5
MCHPCB-E10	ND	80.9
MCHPCB-F9	ND	6.24
MCHPCB-F10	ND	18.9

Key: ppm = Parts per million.
ND = Not detected.

Source: Analytical services procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc.

<p align="center">Table 5</p> <p align="center">PCB Soil Sampling Analytical Results</p> <p align="center">MichCon Station H</p> <p align="center">Detroit, Michigan</p> <p align="center">June 18, 1998</p> <p align="center">(units = ppm)</p>		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-C2-2	7.52	ND
MCHPCB-C3-2	4.25	ND
MCHPCB-C3-2D	3.12	ND
MCHPCB-C4-2	ND	26.4
MCHPCB-C5	21.3	ND
MCHPCB-C6	19.7	ND
MCHPCB-D3-2	ND	7.96
MCHPCB-D4-2	ND	15.0
MCHPCB-D5-2	ND	42.4
MCHPCB-D6	20.7	ND
MCHPCB-E3-2	ND	9.33
MCHPCB-E3-2D	ND	18.5
MCHPCB-E4-2	ND	12.8
MCHPCB-E5-2	ND	0.95
MCHPCB-F3-2	ND	6.26
MCHPCB-F4-2	ND	21.4
MCHPCB-F5-2	ND	6.44
MCHPCB-G3-2	ND	14.1
MCHPCB-G5-2	ND	6.07
MCHPCB-H3-2	ND	14.1
MCHPCB-H4-2	ND	12.3

Table 5 (cont.) PCB Soil Sampling Analytical Results MichCon Station H Detroit, Michigan June 18, 1998 (units = ppm)		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-H4-2D	ND	33.8
MCHPCB-H5	ND	2.95
MCHPCB-I3-2	ND	6.17

Key: ppm = Parts per million.
ND = Not detected.

Source: Analytical services procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc

Table 6 PCB Soil Sampling Analytical Results MichCon Station H Detroit, Michigan June 19, 1998 (units = ppm)		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-A7-2	ND	10.1
MCHPCB-B10-2	3.10	ND
MCHPCB-C8-2	ND	5.20
MCHPCB-D1	ND	1.92
MCHPCB-D1D	ND	9.77
MCHPCB-D2	12.0	ND
MCHPCB-E1	ND	5.93
MCHPCB-E2	ND	15.3
MCHPCB-F1	ND	14.0
MCHPCB-F2	ND	17.6
MCHPCB-G1	ND	4.67
MCHPCB-G2	ND	21.0
MCHPCB-H1	ND	0.75
MCHPCB-H2	ND	17.3
MCHPCB-I1	ND	1.50
MCHPCB-I2	10.5	ND

Key: ppm = Parts per million.
ND = Not detected.

Source: Analytical procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc

Table 7 PCB Soil Sampling Analytical Results MichCon Station H Detroit, Michigan June 22, 1998 (units = ppm)		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-C4-3	8.30	ND
MCHPCB-D5-3	10.4	ND
MCHPCB-E10-2	ND	61.6

Key: ppm = Parts per million.
 ND = Not detected.

Source: Analytical services procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc

Table 8 PCB Soil Sampling Analytical Results MichCon Station H Detroit, Michigan June 23, 1998 (units = ppm)		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-E10-3	ND	31.6
MCHPCB-H4-2	ND	8.6
MCHPCB-H4-2D	ND	13.8

Key: ppm = Parts per million.
ND = Not detected.

Source: Analytical services procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc.

Table 9 PCB Soil Sampling Analytical Results MichCon Station H Detroit, Michigan June 24, 1998 (units = ppm)		
Sample Designation	Parameter	
	Aroclor 1248	Aroclor 1254
MCHPCB-E10-4	ND	1.10

Key: ppm = Parts per million.
ND = Not detected.

Source: Analytical services procured by ERCS- Shrader Analytical and Consulting Laboratories, Inc.

<p align="center">Table 10</p> <p align="center">Inorganic Analytical Results from Suspected Manufactured Gas Plant Waste</p> <p align="center">MichCon Station H</p> <p align="center">Detroit, Wayne County, Michigan</p> <p align="center">July 9, 1998</p> <p align="center">(units = mg/kg unless otherwise noted)</p>		
Parameter	Sample Designation	
	MCHSS-011	MCHSS-012
pH	2.4 s.u.	5.2 s u
Arsenic	17	19
Barium	72	140
Cadmium	4.7	4.5
Chromium	5.6	17
Copper	28	26
Iron	44,000	36,000
Lead	160	330
Mercury	3.0	2.0
Selenium	ND	0.58
Silver	ND	ND
Zinc	37	240

Key: s.u. = Standard units.
 mg/kg = Milligrams per kilogram.
 ND = Not detected.

Source: Laidlaw Environmental, Inc./Encotec and Texas Oiltech Laboratories, Inc.
 Analytical TDD S05-9807-801.

Table 11 Organic Analytical Results from Suspected Manufactured Gas Plant Waste MichCon Station H Detroit, Wayne County, Michigan July 9, 1998 (units = $\mu\text{g/kg}$)		
Parameter	Sample Designation	
	MCHSS-011	MCHSS-012
Acenaphthylene	ND	890
Benzo(a)anthracene	7,900	6,000
Benzo(a)pyrene	4,700	4,900
Benzo(b)fluoranthene	14,000	9,500
Benzo(g,h,i)perylene	5,200	4,400
Benzo(k)fluoranthene	4,200	2,900
Chrysene	14,000	8,200
Dibenz(a,h)anthracene	1,900	1,700
Fluoranthene	11,000	6,700
Indeno(1,2,3-c,d)pyrene	5,000	4,000
Napthalene	4,500	1,000
Phenanthrene	3,900	1,600
Pyrene	ND	6,300

Key: $\mu\text{g/kg}$ = Micrograms per kilogram.
 ND = Not detected.

Source: Laidlaw Environmental, Inc./Encotec.
 Analytical TDD: S05-9807-801.

Attachment B

Extent-of-Contamination Sampling Plan

2

**EXTENT OF CONTAMINATION SAMPLE PLAN
FOR
MICHCON STATION H SITE
DETROIT, WAYNE COUNTY, MICHIGAN
TDD: S05-9803-016
PAN: 8M1601RAXX**

June 12, 1998

Prepared for:

**Jim Augustyn, OSC
Ralph Dollhopf, OSC
U.S. EPA, Region 5**

Prepared by:

**Erin Busby and Robert Wilson, START Project Managers
Ecology and Environment, Inc.**

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B	Guidance Document - Verification of Soil Remediation, MDNR, April 1994	B-1
C	Title 40 Code of Federal Regulations, Part 761, Subpart G	C-1

1.0 INTRODUCTION

The United States Environmental Protection Agency (U.S. EPA) requires that all environmental monitoring and measurement efforts mandated or supported by U.S. EPA, participate in a centrally managed quality assurance (QA) program. Any party generating data under this program has the responsibility to implement minimum procedures to assure that the precision, accuracy, completeness, and representativeness of its data are known and documented. To ensure the responsibility is met uniformly, each party must prepare a written Field Sampling Plan (FSP) covering each project it is to perform.

This FSP presents the organization, objectives, functional activities and specific Quality Assurance (QA) and Quality Control (QC) activities associated with the removal projects conducted by the Emergency Response Branch in Region 5. This FSP also describes the specific protocols which will be followed for sampling, sample handling and storage, chain of custody, and laboratory analysis.

All QA/QC procedures will be in accordance with applicable professional technical standards, U.S. EPA requirements, government regulations and guidelines, and specific project goals and guidelines. This FSP is prepared by Ecology & Environment, Inc., Superfund Technical Assessment and Response Team (START) under TDD #S05-9803-016.

2.0 SITE DESCRIPTION AND HISTORY

2.1 Site Location

The MichCon Station H (MCH) site is located at 201 South Green Avenue in Detroit, Michigan (Figure 1). The site is located at geographical coordinates latitude 42°18'1" N and longitude 83°6'19" W. This site is the location of a former carburetted water gasification plant known as the Detroit City Gas Plant (DCGP). DCGP is currently known as Michigan Consolidated Gas Company (MichCon).

The site is situated in an urban/industrial area and is bounded to the northwest by Chesapeake and Ohio Railroad tracks, to the northeast by Post Street, to the southeast by a commercial business, and to the southwest by South Green Avenue and a commercial produce distributor. The nearest residential areas are located approximately 0.25 miles south and southeast of the site. Southwestern High School is located at the southeastern corner of Post and Fort Streets, approximately 500 feet northeast of the site.

The DCGP operations ceased in 1945, and the majority of the property was sold to the American Charcoal Company (ACC). ACC operated the site between 1946 and 1976. In 1976, the site was sold to the A & A Scrap Iron Metal Company (A & A). A & A utilized the site as a scrap metal storage and processing facility until 1995, when the site reverted to the State of Michigan due to nonpayment of property taxes. According to City of Detroit Environmental Affairs personnel, the City of Detroit obtained the property from the State of Michigan for Brownfields redevelopment in November 1997.

Although the main portion of the site was sold by MichCon in 1946, MichCon currently owns a small parcel on the site. The southeastern portion of the site was the former location of a railroad spur, and the present owner of this area is not known.

2.2 Preliminary Assessment/Site Inspection Results

EDI Engineering and Science (EDI), retained by MichCon, conducted an initial site investigation in August 1984. The scope of the investigation included assessing the air, surface and subsurface soils, and groundwater at the site. Analytical results indicated that the surface soils contained elevated total lead concentrations as high as 1,500 milligrams per kilogram (mg/kg). Analytical results from groundwater samples indicated additional contamination with several inorganic contaminants and polynuclear aromatic hydrocarbons.

The City of Detroit scheduled the buildings at the site for upcoming demolition. The Michigan Department of Environmental Quality (MDEQ) conducted a limited removal of surface drums inside the buildings and scattered throughout the site areas. On November 10, 1997, MDEQ removed 37 drums containing various materials, including oils, resins, paint sludges, petroleum distillates, and phosphoric acid.

On February 3, 1998, the Ecology & Environment, Inc. (E & E), Superfund Technical Assessment and Response Team (START) met with Ed Novak of MDEQ and conducted a site reconnaissance. START observed that the site consisted of two brick buildings, a concrete pad and building foundation, and three piles of soil and debris. The three piles contained soil, construction debris, and waste with many drums visible in each pile. The site was not adequately fenced on the northeastern side allowing unrestricted access to the site.



A second site visit on February 4, 1998, with U.S. EPA On-Scene Coordinator (OSC) Ralph Dollhopf revealed two rusted capacitors at the site with stained soil underlying one of the capacitors. START returned to the site on February 6, 1998, to collect samples from the capacitors and underlying soil. Analytical results obtained from samples collected from residual oil and soil beneath one of the capacitors indicated 100,000 mg/kg polychlorinated biphenyls (PCBs).

2.3 Removal Activities Performed and Current Site Situation

On June 8, 1998, U.S. EPA, START, and the Emergency Cleanup Services (ERCS) mobilized to the site to conduct removal activities. The proposed activities included: develop and implement a site health and safety plan and emergency contingency plan; implement appropriate site security measures; identify, inventory, and characterize hazardous wastes in drums and small containers found on site, transport and dispose of hazardous materials/hazardous waste, including electrical capacitors, in compliance with U.S. EPA's Off-Site Rule (40 CFR Section 300.440, 58 Federal Register 49215 September 22, 1993, conduct an extent-of-contamination (EOC) study of surface soils; evaluate removal and disposal options for contaminated surface soil; and dispose of highly contaminated soil identified in the EOC in accordance with appropriate cleanup standards.

The site safety plan has been prepared and approved. Site security has also been put into place. ERCS has completed cleaning of the soil piles and the drums have been staged. Soil has been excavated under the former locations of the two capacitors identified during the site assessment and under an additional capacitor identified during removal activities. The drums have been sampled for waste characterization and disposal acceptance and analytical results are pending.



 <p>Michigan</p> <p>Detroit</p>	 <p>ecology and environment, inc. Superfund Technical Assessment and Response Team Region 5</p>		
	<p>TITLE</p> <p>Site Location Map</p>	<p>FIGURE</p> <p>1</p>	
	<p>SITE</p> <p>MichCon "H"</p>	<p>SCALE</p> <p>1:17,280</p>	
<p>SOURCE/DATE</p> <p>USGS 7.5 Minute Series</p> <p>Detroit and Dearborn Quadrangles 1980 and 1982</p>	<p>CITY</p> <p>Detroit</p>	<p>STATE</p> <p>Michigan</p>	<p>TED</p> <p>905-8803-018</p>

3.0 PROJECT OBJECTIVES

3.1 Specific Objectives

The objectives for the proposed sampling activities are derived from the potential for PCB contamination at the site in the soils surrounding the immediate location of the capacitors. The entire site will be characterized for PCB contamination due to the uncertainty surrounding how and when the capacitors were brought to the site.

The main focus of the extent of contamination study will be on the surface soils at the site. A thorough analysis of the surface soils at the site would provide the location and concentration of any additional contamination at the site.

3.2 Scope of Project

The primary sample analysis for surface soils is to be based upon the recent finding of PCB-contaminated soil identified at the site. Generic Residential/Commercial/Industrial Cleanup Criteria for soil was established provided in the MDEQ document entitled Integrated Tables of Part 201 Cleanup Criteria & Screening Levels, 1994. The total values, based on human health effects due to direct contact for a commercial property, is 9.3 parts per million (ppm). The Toxic Substance Control Act (TSCA) specifies in Title 40 Code of Federal Regulations Section Part 761, Subpart G that for PCB spills in nonrestricted access areas, the cleanup level will be 10 ppm by weight. Any soils that are found to exceed either the MDEQ or TSCA action levels will be assessed for removal during the time-critical removal activities.

3.3 Data Quality Assurance/Quality Control

To assure the validity of the sample procedure and laboratory analysis, the collected samples could be analyzed under the QA2 rationale as set forth in OSWER Directive 9360.4-01, April 1990. A collocated sample will be collected to determine the variability of the matrix and contaminants at the site within a small area.

4.0 SAMPLING PROCEDURES AND LOCATIONS

4.1 Sampling Protocol

The extent of contamination will be determined by sampling surface soil at the MCH site. The surface soil sampling will be done to determine the potential health and safety concerns based on threats to future workers and nearby residential populations. The Standard Operating Procedure for Soil Sampling (Appendix A); Guidance Document - Verification of Soil Remediation (Appendix B); and the Title 40 Code of Federal Regulations, Part 761, Subpart G (Appendix C) will be followed to the maximum extent practical to complete the extent of contamination study. The surface soil samples will be collected using a teflon or stainless steel hand trowels or spoons. Sampling will proceed from the least impacted area to the most impacted area if discernable. All sampling stations will be staked or marked in the field and documented in a field logbook (Figures 2)

4.2 Sampling Locations

The surface soil sampling grid origin is located in the western corner of the MCH site at Post Street. The grid blocks are 30 feet by 30 feet square and are laid out with a numbering system that runs parallel to the South Green Avenue and Post Street. A total of 68 grids will be laid out and 25 percent of those grid squares will be sampled. The grids chosen to be sampled will be bias in areas of suspected contamination (near known areas of contamination, under former soil piles) and the remaining will be random. The samples will consist of 20 aliquots per grid to form a composite sample of the surface soil within the grid. The proposed locations of surface samples are shown on Figure 2.

A section of the site from grid square D1 to H10 will be sampled after the completion of soil excavation to a reasonable depth which would remove potentially PCB-contaminated soil. At the completion of the excavation, samples will be collected from this area following the guidelines outlined in this plan.

4.3 Analytical Services

All soil samples being analyzed for PCBs will be sent to an EPA approved environmental laboratory for analyses. The ERCS contractor will bid and acquire a laboratory for the analyses of all concrete, water, and soil samples. The samples will be packed on ice and delivered to the laboratory no later than two days after sample collection. A completed and signed Chain of Custody will accompany the samples throughout any shipment or transfers.

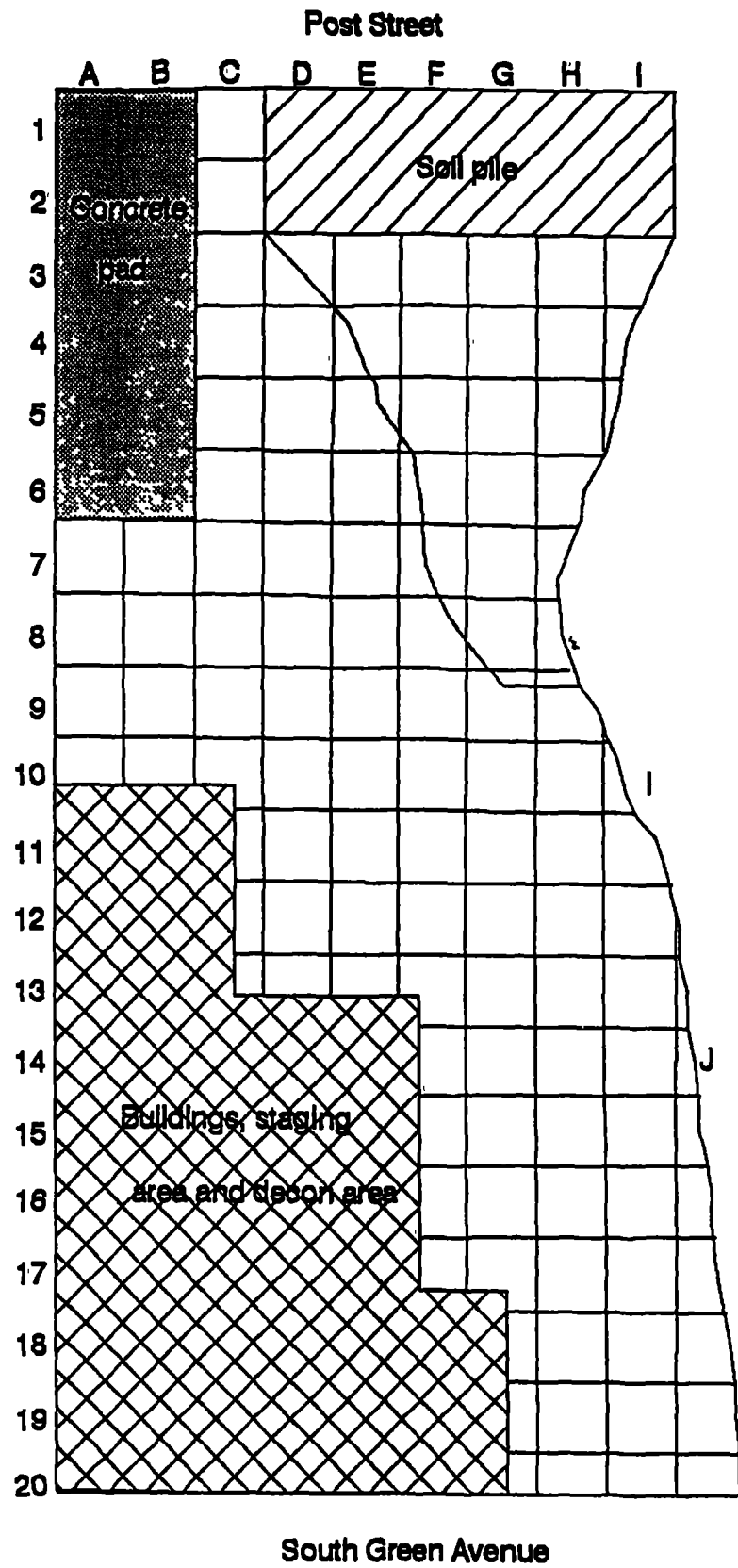


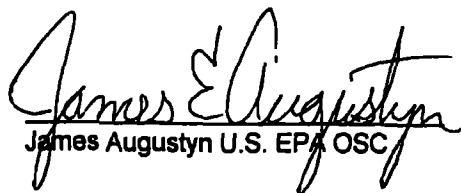
Figure 2

5.0 SUMMARY

The goal of the sampling event is to assess the need for further action. Further action could include excavation of impacted soil or recommendations to another party for further action. Upon receipt of the analytical results, the U.S. EPA will consult the previously mentioned documents to determine the appropriate steps to be taken.

1

I agree that the proposed Extent of Contamination sampling plan is complete and accurate according to known guidelines and regulations and that this plan will be used as a guideline for soil sampling procedures at the MichCon Station H site.

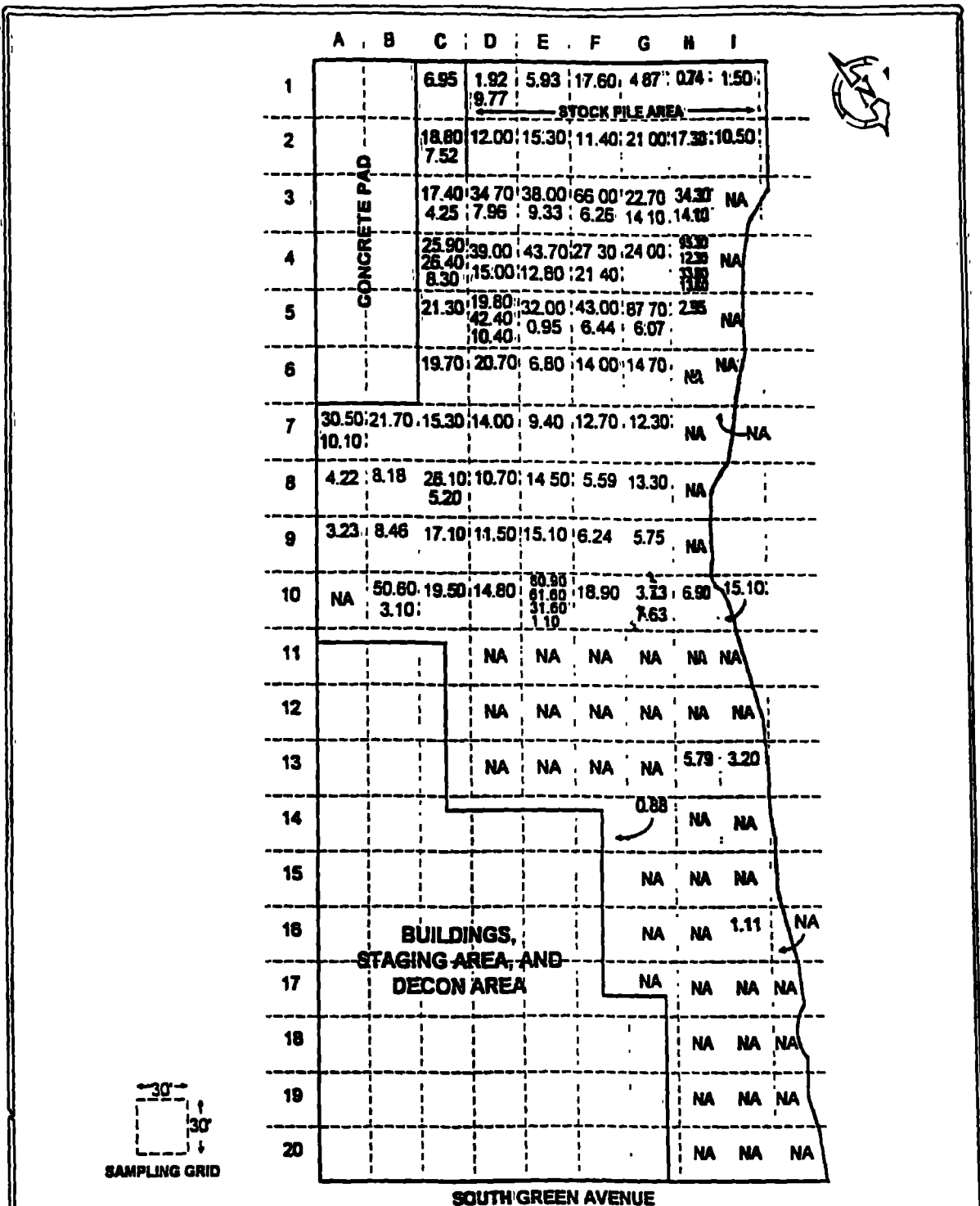

James Augustyn U.S. EPA OSC

6-13-98
Date

Attachment C

Site Illustration

1



Key

Values Listed In Parts Per Million

Values Listed In Sampling Order

Per Grid Square

Duplicates, listed directly

below paired sample

in grid

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Superfund Technical Assessment and Response Team

Region 5

TITLE	FIGURE
PCB Sampling Grid Map	1
SITE	SCALE
MichCon 'HP	Not to Scale
CITY	TOC
Detroit	905-9803-016